1 2 3 4 5 6 7	SCOTT YUNDT (CSB #242595) TRI-VALLEY CARES 2582 Old First Street Livermore, California 94550 Telephone: (925) 443-7148 Facsimile: (925) 443-0177 Email: scott@trivalleycares.org Attorneys for Plaintiffs TRI-VALLEY CARES	
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9	IN THE UNITED STATES DISTRICT COURT	
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
11	San Francisco Division	
12	TRI-VALLEY CARES,) Case No.: 10-cv-5923 RS
13 14 15 16 17	Plaintiffs, vs. UNITED STATES DEPARTMENT OF ENERGY, Defendants.	STIPULATION AND [PROPOSED] ORDER TO RESCHEDULE INITIAL CASE MANAGEMENT CONFERENCE
18 19)
20	Plaintiff Tri-Valley CAREs, Defendant United States Department of Energy, by and through	
21	their respective counsel, hereby stipulate as follows:	
22	WHEREAS, pursuant to the Clerk's Notice filed 2/16/11, the initial Case Management	
23	Conference in the above captioned case was scheduled to be held on April 14, 2011 at 10:00	
24	a.m . in Courtroom 3 on the 17 th Floor of the United States Courthouse, 450 Golden Gate	
25	Avenue, San Francisco; and	
26	WHEREAS, Plaintiffs and Defendants desire to reschedule the initial Case Managemen	
27	Conference in the above captioned case to provide the parties with four additional weeks to	
28	discuss the outstanding claims and prepare the Joint Case Management Statement.	

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by Plaintiffs and Defendants, through their respective counsel of record, as follows:

- The Case Management Conference in the instant case, originally scheduled to be held on April 14, 2011 at 10:00 a.m. in Courtroom 3 on the 17th Floor of the United States Courthouse, 450 Golden Gate Avenue, San Francisco, shall be rescheduled to May 12, 2011 at 10:00 a.m. in that same location.
- 2. The parties shall file a Joint Case Management Statement at least one week prior to the Conference.
- 3. The foregoing agreement is not intended, and may not be cited by any party, as admission of any issue of fact or law in this or any other judicial or administrative proceeding.

Dated this 1st day of April, 2011

/s/ Scott J. Yundt
Scott J. Yundt
Attorney for Plaintiff

/s/ Abraham Simmons
Abraham Simmons
Attorney for Defendant

DECLARATION OF CONSENT Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Abraham Simmons. Dated this 1st day of April, 2011 /s/ Scott J. Yundt Scott J. Yundt Attorney for Plaintiff

1	[PROPOSED] ORDER	
3	1. The Case Management Conference in the instant case, originally scheduled to be held on April 14, 2011 at 10:00 a.m. in Courtroom 3 on the 17 th Floor of the United States Courthon	
4567	450 Golden Gate Avenue, San Francisco, shall be rescheduled to May 12, 2011 at 10:00 a.m in that same location.	
8 9	IT IS SO ORDERED.	
10 11 12 13	DATED_4/4/11 HONORARI E RICHARD STERORG	
14 15 16	HONORABLE RICHARD SEEBORG United States District Judge Presented by: /s/Scott Yundt Scott Yundt (CSB# 242595) Attorney for Plaintiffs	
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